

## United States District Court

FOR THE  
**NORTHERN DISTRICT OF CALIFORNIA**

## VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

FILED

JUN 20 2017  
USAN

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ROOZBECH IRAVANI,

WHA

CR 17 0340

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 2252(a)(4)(B) - Possession of Child Pornography;  
18 U.S.C. § 2253- Criminal Forfeiture

---

A true bill

---

Foreman

Filed in open court this 20<sup>th</sup> day of

JDHE 2017

Rose Maher ROSE MAHER  
Clerk

Bail,

Laurel Beeler, U.S. Magistrate Judge

1 - th

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY:  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. § 2252(a)(4)(B); Possession of Child  
 Pornography;  
 18 U.S.C. § 2253 – Criminal Forfeiture

Petty  
 Minor  
 Misdemeanor  
 Felony

## PENALTY:

Maximum prison term of 10 years  
 Maximum fine of \$250,000  
 Maximum term of supervised release: life  
 Mandatory special assessment of \$100

## PROCEEDING

Name of Complainant Agency, or Person (&amp;Title, if any)

FBI Special Agent Dave Brown

person is awaiting trial in another Federal or State  
 Court, give name of court

this person/proceeding is transferred from another  
 district per (circle one) FRCrP 20, 21 or 40. Show  
 District

this is a reprocution of  
 charges previously dismissed  
 which were dismissed on  
 motion of:

U.S. Att'y  Defense

this prosecution relates to a  
 pending case involving this same  
 defendant

prior proceedings or appearance(s)  
 before U.S. Magistrate regarding  
 this defendant were recorded under

SHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

Name and Office of Person  
 Furnishing Information on  
 THIS FORM

BRIAN J. STRETCH

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y  
 (if assigned)

Randall Leonard

## PROCESS:

SUMMONS  NO PROCESS\*

WARRANT Bail Amount: NO BAIL

If Summons, complete following:

Arraignment  Initial Appearance

Defendant Address:

\*Where defendant previously apprehended on complaint, no new summons  
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA

## DEFENDANT - U.S.

Roozbeh Iravani

DISTRICT COURT NUMBER

JUN 20 2017  
 SUSAN Y. SOONG  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 CR 17 0340 WHA

CR 17 0340 WHA

## DEFENDANT

## IS NOT IN CUSTODY

1)  Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons  
 was served on above charges

2)  Is a Fugitive

3)  Is on Bail or Release from (show District)

## IS IN CUSTODY

4)  On this charge

5)  On another conviction  
 Awaiting trial on other charges }  Fed'l  State

6)  If answer to (6) is "Yes", show name of institution

Has detainer  
 been filed?  Yes  No } If "Yes"  
 give date  
 filed

DATE OF  
 ARREST  Month/Day/Year

Or... if Arresting Agency & Warrant were not  
 Month/Day/Year

DATE TRANSFERRED  
 TO U.S. CUSTODY

This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

SUMMONS  NO PROCESS\*

WARRANT Bail Amount: NO BAIL

If Summons, complete following:

Arraignment  Initial Appearance

Defendant Address:

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

2017 JUN 20 P 12:01  
FILED  
SUSAN K. SONG  
CLERK, U.S. DISTRICT COURT  
NO. 2017CR0340-CA

1 BRIAN J. STRETCH (CABN 163973)  
2 United States Attorney  
3  
4  
5  
6 [REDACTED]  
7  
8

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WHA

12 UNITED STATES OF AMERICA, ) CR 17 0340  
13 Plaintiff, ) CASE NO.  
14 v. ) VIOLATION:  
15 ROOZBEH IRAVANI, ) 18 U.S.C. § 2252(a)(4)(B) – Possession of Child  
16 Defendant. ) Pornography; 18 U.S.C. § 2253 – Criminal Forfeiture  
17 ) SAN FRANCISCO VENUE  
18 )  
19 I N D I C T M E N T

20 The Grand Jury charges:

21 COUNT ONE: (18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography)

22 Beginning on a date unknown, but continuing through on or about March 10, 2017, in the  
23 Northern District of California, the defendant,

24 ROOZBEH IRAVANI,  
25 did knowingly possess matter which contained at least one visual depiction that had been shipped and  
26 transported using a means and facility of interstate and foreign commerce, and in and affecting interstate  
27 and foreign commerce, and which was produced using materials that had been mailed, shipped, and  
28 transported in interstate commerce, by any means including by computer, the production of which

INDICTMENT

1 involved the use of a minor who had not attained 12 years of age, engaging in sexually explicit conduct,  
2 and which visual depiction was of such conduct, in violation of Title 18, United States Code, Section  
3 2252(a)(4)(B).

4 **FORFEITURE ALLEGATION:** (18 U.S.C. §§ 2253(a)(1)-(3) – Criminal Forfeiture)

5 1. The allegations contained in Count One of this Indictment are hereby re-alleged and  
6 incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States  
7 Code, Section 2253.

8 2. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252,  
9 the defendant,

10 ROOZBEH IRAVANI,

11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, (a) any visual  
12 depiction described in Title 18, United States Code, sections 2251, 2251A, 2252, or 2252A or any book,  
13 magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which  
14 was produced, transported, mailed, shipped or received in violation of Title 18, United States Code,  
15 Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other  
16 proceeds obtained from the offense; and (c) any property, real or personal, used or intended to be used to  
17 commit or to promote the commission of the offense, including but not limited to the following items:

18 a. Dell Inspiron 7720 laptop computer, service tag: 3542FT1;  
19 b. Toshiba MQ01AB100 1TB hard drive, s/n Y3HKSAM9S;

20 3. If any of the property described above, as a result of any act or omission of the defendant,  
21 a. cannot be located upon the exercise of due diligence;  
22 b. has been transferred or sold to, or deposited with, a third party;  
23 c. has been placed beyond the jurisdiction of the court;  
24 d. has been substantially diminished in value; or  
25 e. has been commingled with other property which cannot be divided,

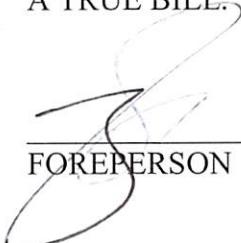
26 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
27 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)

28 INDICTMENT

1 and by Title 28, United States Code, Section 2461(c).  
2

3 DATED: 20 JUNE 2017

A TRUE BILL.

  
6  
7 FOREPERSON

8  
9 BRIAN J. STRETCH  
10 United States Attorney

11  
12 BARBARA VALLIERE  
13 Chief, Criminal Division

14  
15 (Approved as to form: R. J. L.)  
16 AUSA RANDALL LEONARD

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28 INDICTMENT